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May 6, 2021

VIA CM/ECF

Re: Request to Hold Motions to Dismiss in Abeyance Pending the Motion to Recuse

U.S. v. Navarro, et al., 20-cr-160-MKV (S.D.N.Y.)

Dear Judge Vyskocil:

We write to advise your Honor that, following a joint conference amongst counsel for the Defendants, Defendants are contemplating a Motion to Recuse your Honor. The issue was raised with the government this afternoon on a telephone conference.

Accordingly, we respectfully request that your Honor hold in abeyance any rulings on Defendant Seth Fishman and Lisa Giannelli's Motion to Dismiss [ECF-327], Defendant Chris Oakes' Motion to Dismiss [ECF-328], Defendant Michael Tanuzzo's Motion to Dismiss [ECF-325], Defendant Jorge Navarro's Motion to Join [ECF-329], Erica Garcia's Motion to Join [ECF-330], and Jordan Fishman's Motion to Join [ECF-331] pending the Motion to Recuse. f

Respectfully submitted,

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Honorable Mary K. Vyskocil
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